

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
RICK MULA  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
Rick\_Mula@fd.org  
6  
7 Attorney for Jonathan Cortez-Ramirez

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13  
14 v.  
15 JONATHAN CORTEZ-RAMIREZ,  
Defendant.

Case No. 2:22-cr-00201-GMN-NJK

**STIPULATION TO VACATE STATUS  
CONFERENCE**

16  
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and David C. Kiebler, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Rick Mula,  
20 Assistant Federal Public Defender, counsel for Jonathan Cortez-Ramirez, that the Status  
21 Conference currently scheduled for July 21, 2023, at 9:00 a.m. be vacated.

22 This Stipulation is entered into for the following reasons:

- 23 1. Mr. Cortez-Ramirez appeared for a hearing on revocation of supervised release  
24 on July 11, 2023. (ECF No. 23)  
25 2. Prior to the hearing, the parties negotiated a resolution of Mr. Cortez-Ramirez's  
26 case.

1           3.       The parties jointly recommended the following: (1) that the Court order Mr.  
2 Cortez-Ramirez to attend inpatient treatment at WestCare; (2) that the Court hold the petition  
3 (ECF No. 9) and addendum (ECF No. 18) in abeyance until the treatment is concluded; (3)  
4 following successful completion of the program, that Mr. Cortez-Ramirez will admit to  
5 violation 1A of the petition (ECF No. 9); and (4) that the remaining violations (including those  
6 in the addendum) will be dismissed.

7           4.       The Court accepted the parties' joint recommendation and ordered Mr. Cortez-  
8 Ramirez to be released on July 18, 2023, for the purpose of attending an assessment at WestCare  
9 and transitioning into WestCare's inpatient program. (ECF Nos. 23, 24.)

10          5.       The Court also set a status conference for July 21, 2023, at 9:00 a.m. The purpose  
11 of the status conference is to confirm that Mr. Cortez-Ramirez attended the assessment, was  
12 approved for the program, and actually transitioned into the program. (ECF No. 23.)

13          6.       United States Probation Officer Javier Muruato has confirmed that Mr. Cortez-  
14 Ramirez completed the WestCare assessment, was approved for the inpatient program, and  
15 actually has transitioned into the program as of the morning of July 20, 2023.

16          7.       Accordingly, there is no need for a status conference, and the parties respectfully  
17 request that the Court vacate the status conference set for July 21, 2023, at 9:00 a.m.

18               DATED this 20th day of July, 2023.

19  
20       RENE L. VALLADARES  
21       Federal Public Defender

          JASON M. FRIERSON  
          United States Attorney

22       By /s/ Rick Mula

          By /s/ David C. Kiebler

23       RICK MULA  
24       Assistant Federal Public Defender

          DAVID C. KIEBLER  
          Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 JONATHAN CORTEZ-RAMIREZ,  
7 Defendant.  
8

Case No. 2:22-cr-00201-GMN-NJK

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the status conference currently scheduled for July  
11 21, 2023 at 9:00 a.m., be vacated.

12 DATED this 20 day of July, 2023.

13  
14   
15 UNITED STATES DISTRICT JUDGE  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26